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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NOTICE OF MOTION

VIKRAM DATTA

Defendant. :

PLEASE TAKE NOTICE that, upon the Government's Memorandum of Law in Support of the Government's Motion to Dismiss the Petition of Hanan Enterprise Sales Inc. and VNR International, Inc. T/A/M. Tilani Enterprises For Failure to Prosecute, together with the exhibits thereto, the United States of America will move before the Honorable Lewis A. Kaplan, United States District Judge for the Southern District of New York, at such time as the Court shall direct, for an Order dismissing the petition of Hanan Enterprise Sales Inc. and VNR International, Inc. T/A/M. Tilani Enterprises for failure to prosecute, and such other

relief as the Court may determine to be just and proper.

Dated: New York, New York September 2, 2015

Respectfully submitted,

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for the Plaintiff
United States of America

By: /s/ KAN M. NAWADAY

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